

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

DELOISE MCMURRAY, individually, and  
on behalf of all others similarly situated,

Plaintiff,

v.

STRATEGIC LIMITED PARTNERS, LP and  
GENUINE DATA SOLUTIONS,

Defendant(s).

Civil Action No. 24-cv-00512

**DEFENDANT’S MOTION FOR EXTENSION OF TIME  
TO ANSWER OR OTHERWISE PLEAD**

NOW COMES the Defendant, STRATEGIC LIMITED PARTNERS, LP, by its attorneys Peterson, Johnson & Murray LLC and move this Honorable Court for its Motion for Extension of Time to Answer or Otherwise Plead to May 2, 2024, states as follows:

1. Plaintiff, Deloise McMurray, filed her Complaint on February 12, 2024.
2. Defendant, National Individual Insurance Agency, LLC was served on April 2, 2024.
3. Undersigned counsel is in the process of investigating the allegations contained within the Complaint and requires additional time to prepare responsive pleadings to plaintiff’s complaint.
4. Attorney Dominick Lanzito has left voicemail messages at counsel’s office<sup>1</sup> and sent an email to Plaintiff’s counsel requesting a 21-day extension. (Ex. 1, Email to Amy Ginsburg dated April 16, 2024).
5. Counsel for the defense has not heard back from Plaintiff’s counsel’s regarding the requested extension of time to answer or otherwise plead.

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<sup>1</sup> The undersigned left voicemail messages at counsel’s Pennsylvania office.

5. The extension of time requested through this motion will prejudice no party and it is not intended for any improper purpose, such as to needlessly compound the expense of litigation or otherwise inconvenience the Court, parties or counsel.

WHEREFORE, for the above and foregoing reasons, Defendant, STRATEGIC LIMITED PARTNERS, LP respectfully request that this Honorable Court enter an Order granting Defendant an extension of time until May 14, 2024, within which time to file pleadings responsive to Plaintiff's Class Action Complaint.

On this 25<sup>th</sup> Day of April 2024;

Respectfully,



Signature

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State Bar Number: 08118563

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**\*\*Certificate of Service on the following page \*\***

**CERTIFICATE OF SERVICE**

I hereby certify that this 25<sup>th</sup> day of April 2024, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Southern District of Texas, Houston Division, by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

By: /s/ Suzanne Hester  
Suzanne Hester

Suzanne Hester  
Paralegal for Alexander J Gonzales  
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